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March 5, 1990

Ms. Ruth Mancos  
 Emergency Support Section  
 U.S. ENVIRONMENTAL PROTECTION AGENCY,  
 5HS-11  
 230 South Dearborn Street  
 Chicago, IL 60604

Re: Request for Information Pursuant to Section 104(e)  
 of CERCLA and Section 3007 of RCRA, for the  
 Conservation Chemical Company Site, in Gary,  
 Indiana  
 Your No. 5HS-11

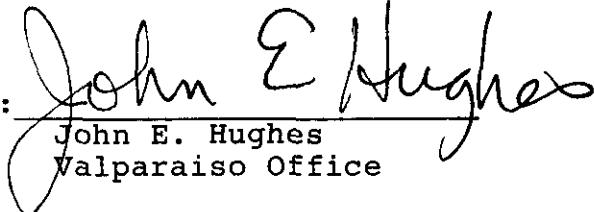
Dear Ms. Mancos:

Please find enclosed an additional response to the EPA  
 questionnaire with the executed, notarized Affidavit, pursuant to  
 instruction 7.

Very truly yours,

HOEPPNER, WAGNER AND EVANS

By:

  
 John E. Hughes  
 Valparaiso Office

JEH/jd  
 Enclosure

RESPONSE TO EPA REQUEST FOR INFORMATION  
PURSUANT TO SECTION 104(e) OF CERCLA IN SECTION 3007  
OF RCRA FOR CONSERVATION CHEMICAL COMPANY, INC.

Charles R. Hain, as Vice President of Finance, submits the following answers to the Request For Information dated January 30, 1990, regarding the Conservation Chemical Company site, Gary, Indiana:

1. The following persons contributed to the preparation of the answers:

Charles R. Hain	V.P. Finance
James A. Breisch	Manager Industrial Engineering
John Tyrpak	Maint. Foreman (Ret.)
Richard Zinevich	Purchasing Agent
Larry Garris	Lead Man
Ronald J. Viasaty	Midtown Petroleum
Gary Vickerman	Houghton
Brenda H. Pinkelton	Cincinnati <del>Milikron</del> Milacron <i>CRH</i>
Ted Barg	Foreman (Ret.)
Jack Williams	Plant Engineer (Ret.)

Other current Klein employees were consulted in records searches and to determine if they had any knowledge of this period, but only the people above provided information. All of the above are located at 7200 McCormick Boulevard, Chicago, Illinois 60645, during normal business hours. The current addresses for the retired individuals are as follows:

John Tyrpak

Ted Barg

\*\*

2. Conservation Chemical Company of Indiana incoming transaction sheets (copies of which are enclosed), which were supplied by counsel for the 6500 Industrial Highway Group. These documents were used as a basis to search our records, including current material safety data sheets. All documentation prior to 1980-82 has been disposed of in the normal course of our record disposal policy. We did locate booklets which were kept by a foreman entitled "Avoid Verbal Orders". These booklets contain copies of requisitions for materials and number 50 to 60. From these books, we have determined the identity of some of the products listed in answer No. 7. A sample page is enclosed for your information. If duplication of the entire set of books is necessary, we can accommodate you.

*CRH*

**\*\* Jack Williams**

**5000 Carriageway Court Apt 408  
Rolling Meadows, Illinois 60008**

3. Not to our knowledge.

4. U.S. EPA ILD005149141. There was no such number during the 1970's.

5. None other than the allegations made by the 6500 Industrial Highway Group.

6. John Tyrpak and/or Larry Garris.

7. a) No to the substances specifically identified, no to the question with respect to Conservation Chemical Company, Inc., to the best of the knowledge and information of the persons listed in question No. 1. There are hazardous substances that have been utilized at different times during the manufacturing processes at Klein Tool. These substances are listed below. However, Klein Tool has no knowledge or information that any of these substances were ever disposed of or transported outside the premises by Conservation Chemical Company, Inc.

1. Zinc Balls Anode
2. Caustic Soda Flakes
3. Hydrochloric Acid  
Solution 20-22 Degrees
4. Water Solution Contg.  
Chromic Acid (Aldo Kote DC-70)
5. Promat Cadmium B

MSD sheets for 1-4 are attached.

- b) 1 and 2. Frederick Gumm, [REDACTED]  
[REDACTED]  
3. C.P. Hall, [REDACTED]  
4. Aldoa Company, 12727 Westwood, Detroit, MI.  
5. Crown Rheostat, address unknown.

- c) The products were either consumed in the process or neutralized and disposed of on site. #5 has not been used since at least 1982. After 1985 products 1-4 have been disposed of by licensed haulers.

- d) 1-4 1970's to present.  
5. Not since 1981.

e) [REDACTED]

- f) 1. 4000 pounds annual.  
2. 1980 gallons annual.  
3. 12000 pounds annual.  
4. 360 gallons annual.  
5. Unknown.

8. Enclosed are all of the liability policies that Klein Tools has been able to locate for the named period.

9-10. Pursuant to discussion with your counsel, Klein Tools presents its audited financial statement for December 31, 1988. Klein Tools, Inc. asserts a privilege of confidentiality for the reason that this contains confidential financial information relating to the condition of the company, and might give a competitive advantage to other competitors. This privilege is asserted in accordance with 40 CFR 2.203(b). Each page of the report is marked confidential.

11-12. Not applicable.

A F F I D A V I T

CHARLES R. HAIN, being duly sworn upon his oath, states:

1. He is the Vice President of Finance for Klein Tools, Inc., which is the successor in interest of Mathias Klein & Sons, Inc., and operates its manufacturing facility at the same location, 7200 McCormick Boulevard, Chicago, Illinois.

2. A diligent record search has been completed and there has been a diligent interviewing process with all present and former employees who may have knowledge of the operations, hazardous substance use, storage, treatment, releases, spills, disposal or handling practices of Klein Tools, Inc., formerly known as Mathias Klein & Sons between 1970 to 1985.


3. He has compiled the information attached in response to the EPA request dated January 30, 1990.

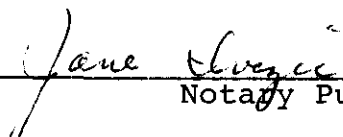
DATED this 8 day of March, 1990.

  
\_\_\_\_\_  
CHARLES R. HAIN

STATE OF ILLINOIS       )  
COUNTY OF Cook       ) SS:

Subscribed and sworn to before me, the undersigned, a Notary Public in and for said County and State, this 8<sup>th</sup> day of March, 1990.

  
My Commission Expires: 3/28/92

  
\_\_\_\_\_  
Notary Public  
County of Residence: Cook

JEH  
**HOEPPNER WAGNER & EVANS**  
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103 East Lincolnway  
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**CERTIFIED**

P 568 473 259

**MAIL**

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